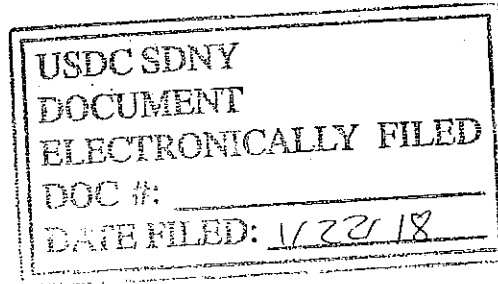


StolperGroup

MEMO ENDORSED
January 19, 2018
VIA ECF and BY HAND

Judge Deborah A. Batts
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: MM Proton I, LLC v. Yory LLC et al, 1:17-cv-10102-DAB

Dear Judge Batts:

I have just been engaged to represent the defendants in the above-referenced matter. I am writing to request a forty-five day extension of the deadline to respond to the complaint. While there is no affidavit of service yet filed, I believe that the deadline to respond is on or about January 22, 2018.

Granted
'S DAB
1/22/18

I wrote to plaintiff's counsel on Wednesday to state that I was in the process of being engaged and to request an extension due to the fact that I was starting a jury trial that day in New York Supreme Court. Plaintiff's counsel, Mr. Platt, denied my request because of plaintiff's motion for injunctive relief. The email exchange is attached. Plaintiff's motion will be heard on February 7, 2018 and has nothing to do with the time by which defendants serve a responsive pleading.

Respectfully submitted,

/s/ *Michael Stolper*

Michael Stolper

cc: Charles Platt, Esq. (counsel for Plaintiffs via ECF and email)

SO ORDERED
Deborah A. Batts
DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

1/22/18

LAW OFFICE

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